

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CHRISTIANA VENTURES, INC., and)	C. A. No. 05-0309 KAJ
JOSEPH CAPANO)	
)	
Plaintiffs,)	
)	
v.)	
)	
SELECTIVE WAY INSURANCE)	
COMPANY a/k/a SELECTIVE)	
INSURANCE GROUP INC, and)	
ONE BEACON INSURANCE,)	
)	
Defendants.)	

**DEFENDANT SELECTIVE WAY INSURANCE COMPANY'S NOTICE OF
DEPOSITION DUCES TECUM OF CHRISTIANA VENTURES, INC.**

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6), counsel for Defendant Selective Way Insurance Company ("Selective") will take the deposition(s) duces tecum upon oral examination of Christiana Ventures, Inc. ("Christiana") by one or more of its officers, directors, managing agents, or other persons who consent to testify on its behalf, with respect to matters known or reasonably available to Christiana as set forth in the attached Appendix To Notice of Rule 30(b)(6) Deposition(s) Duces Tecum of Christiana Ventures, Inc. The deposition(s) will commence on Thursday, May 18, 2006 at 9:00 a.m. at the offices of Murphy Spadaro & Landon, 1011 Centre Road, Suite 210, Wilmington, Delaware 19805.

MURPHY SPADARO & LANDON

By: /s/ Jonathan L. Parshall
Jonathan L. Parshall (No. 3247)
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Wilmington, Delaware 19805
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APPENDIX TO NOTICE OF RULE 30(B)(6) DEPOSITION(S)
DUCES TECUM OF CHRISTIANA VENTURES, INC.

DOCUMENTS AND THINGS REQUESTED

It is requested that at the deposition Christiana produce for inspection and copying at the offices of Murphy Spadaro & Landon any of the following documents and things in its possession, custody, or control:

1. All documents related to bills for legal fees and expenses and payments towards those bills for which Christiana seeks coverage in this litigation.

MATTERS FOR EXAMINATION

The deponent(s) should be prepared to testify concerning all responsive information available to Christiana related to the following subjects:

1. Bills for legal fees and expenses towards those bills for which Christiana seeks coverage in this litigation.
2. The positions held by Joseph Capano at Christiana during the time periods of the policies under which Christiana seeks coverage from Selective.
3. Christiana's knowledge of the litigation between it and the State of Delaware for which it seeks coverage.
4. Communications between it and its representatives (on the one hand and Selective (on the other hand) related to its claim for coverage against Selective.
5. Christiana's knowledge of the policies under which it seeks coverage from Selective.
6. Any agreements or undertakings between it and Joseph Capano related to payment of legal fees and expenses related to the litigation between it and the State of Delaware for which it seeks coverage.

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INSURANCE GROUP INC, and)	
ONE BEACON INSURANCE,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I, Jonathan L. Parshall, Esquire, do hereby certify that on this 12th day of May, 2006, two copies of the foregoing **DEFENDANT SELECTIVE WAY INSURANCE COMPANY'S NOTICE OF DEPOSITION DUCES TECUM OF CHRISTIANA VENTURES, INC.**, were delivered via Electronic filing upon the following individual(s):

Richard H. Cross, Jr., Esquire, I.D. 3576
Amy Evans, Esquire, I.D. 3829
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MURPHY, SPADARO & LANDON

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Attorney for Defendant Selective
Way Insurance Company